



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

AUG 28 2006

MEMORANDUM

SUBJECT: Brown Traffic Products, Inc.
AKA: Eagle Signal Controls
AKA: The Sign Shop
AKA: Danaher Controls
Davenport, Iowa
EPA RCRA ID# No. IAD051001337

FROM: Cynthia Hutchison *Cynthia Hutchison*
ENSV/EAMB

Bob Aston *Bob Aston*
ARTD/RCAP

THRU: Howard Bunch *HB*
CNSL

TO: Lynn M. Slugantz, Chief
ARTD/RCAP Branch

This memorandum documents the determination that corrective action is complete at Brown Traffic Products, of Davenport, Iowa. The memo also recommends a recording of a CA999 (corrective action complete) in the RCRA Info database for Brown Traffic Products. Brown received a National Corrective Action Priority (NCAP) ranking of low on January 7, 1993.

Site History: This facility obtained interim status as Eagle Signal by submitting a Part A hazardous waste permit application on November 14, 1980. On September 22, 1982, they requested a change in status to become a less than 90-day storage facility. They completed closure with the Iowa Department of Water, Air and Waste Management (IDWAWM) and RCRA on August 27, 1984. The closure and termination of interim status was approved by IDWAWM on September 26, 1984.

EPA's intent to deny the permit and the public notice of closure were published on March 11, 1986. Closure was verified and approved by EPA on April 28, 1987. The Comprehensive

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RCRA RECORDS



Permitting database describes receipt of a Part B hazardous waste permit application and loss of interim status (LOIS) due to failure to submit the Part B application on the same day, November 8, 1988. The facility is described as "clean closed" as of February 28, 1985, for their container storage area.

A RCRA Facility Assessment (RFA) equivalent environmental priorities initiative preliminary assessment (EPI/PA) and a visual site inspection (VSI) were conducted by EPA contractor, Camp, Dresser & McKee (CDM) during May 1992. It identified 14 solid waste management units (SWMUs) and two areas of concern (AOC). All SWMUs were located inside the building. AOC #1 was located on a blacktop parking lot surface. AOC #2 was located inside a building. No history or evidence of releases at these areas was documented. No recommendations for further investigation or remediation were made in the EPI/PA or VSI.

An inspection was conducted by EPA contractors on July 10, 1995. The inspectors found that Eagle Signal had vacated the premises in February 1994. They took all of the equipment and cleaned the space before leaving. The floor was sandblasted and a new floor was poured over the old floor. Eagle Signal had 3-1/2 years left on its lease when they left. The new leaseholder, The Sign Shop, manufactured vinyl signs and did not generate hazardous waste. An Iowa screening inspection was conducted in 1998 which documented a change of regulatory status to "non-handler" of hazardous waste for this facility.

There is a January 28, 2003 letter in the file from Bill Lowe, EPA geologist, to Schiltz Properties, Inc., owner of the site, stating: "Based on my review and the currently available information, there does not appear to be any additional investigations or corrective actions required at this time."

Recommendation: This facility gained interim status in 1980 by submitting a Part A permit application. They were released from interim status on September 26, 1984 by the state of Iowa and experienced a federal loss of interim status (LOIS) reflected in EPA's database on November 8, 1988. Their units were RCRA closed by Iowa Department of Natural Resources (IDNR) and by EPA. The closures were public noticed. An RFA did not discover need for any additional investigation or remediation. The facility has changed hands several times and is currently occupied by a non handler. No further public notification is necessary since there is no permit to deny. I recommend placement of a CA999 data code in RCRA Info, signifying corrective action complete.